

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Reallocation of 30 MHz of 700 MHz	)	
Spectrum (747-762/777-792 MHz)	)	
from Commercial Use	)	
	)	RM-11348
Assignment of 30 MHz of 700 MHz	)	
Spectrum (747-762/777-792 MHz)	)	
to the Public Safety Broadband Trust	)	
for Deployment of a Shared Public	)	
Safety/Commercial Next Generation	)	
Wireless Network	)	

**COMMENTS OF NENA**

The National Emergency Number Association (“NENA”) submits these comments pursuant to the FCC staff order dismissing the Petition for Rulemaking of Cyren Call Communications Corporation (“Cyren Call”) seeking the captioned spectrum reallocation and assignment.<sup>1</sup>

It appears that telecommunications is converging on Internet Protocol (“IP”) as the common protocol of the foreseeable future, both for voice and data wire/fiber networks and radio applications. It is also likely that the Public Safety Communications Center of the future -- coordinating 9-1-1 calling, data handling and radio functions across its own and other interacting centers -- will be utilizing IP networks as the standard and common transport for all these activities. These

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<sup>1</sup> DA 06-2278, released November 3, 2006. Although the staff order dismissed the Cyren Call petition without prejudice, it held the RM-11348 docket open for public comment.

applications are expected to operate on general governmental services IP networks, rather than being confined to networks uniquely constructed for them.

Increasing convergence and interoperability among what are now largely separated wire voice and data and wireless applications means that broadband IP networks, both wire and wireless, are fundamental to 9-1-1 emergency calling and public safety success as all parties move to IP transport. Utilization will include Next Generation (“NG”) 9-1-1 (the successor to Enhanced or E9-1-1) for voice, data, text and video on typically wireline IP networks. However, wireless IP networks will come into play both for wire network backup and in cases where wire networks are unavailable or insufficient. It’s possible that some governmental entities will conclude that terrestrial wireless IP networks are their first choice, with satellite-based connectivity for backup, especially in areas where land-based equipment is susceptible to devastating storms or other disasters.

In any scenario, wireless IP capabilities are essential to NG9-1-1, emergency communications in general, and seamless interaction between and among 9-1-1, inter-Call Center, and public and private emergency entities, including emergency radio applications. Wireless broadband IP networks provide solutions to all the above conditions, and NENA has high interest in actions to make this capability widely available.

While it might be possible to achieve the goal using the 24 MHz of 700 MHz spectrum already allocated to public safety, it is not clear how that allotment might be divided among so-called narrowband, wideband and broadband channels. Recognizing that Congress might be called upon to

increase the present 24 MHz allocation for public safety, NENA recently addressed a letter to the Senate acknowledging that

Public Safety Answering Points (“PSAPs”) must be part of a broader next generation emergency communications system capable of not only receiving 9-1-1 calls and data communications from all types of devices, but also must have the ability to seamlessly share that information with the broad emergency response community.

The NENA letter to the Senate identified, without limitation, the following applications for which broadband capabilities would be required or highly desirable:

[T]elematics, automatic crash notification data, transmission of building diagrams to firefighters, digital image and other large file transfers, monitoring of medical or environmental data from scenes of individual trauma or mass disaster, and full-motion video from field to headquarters and from emergency response vehicles to headquarters and other field responders.<sup>2</sup>

NENA commends Cyren Call for its initiative and vision in proposing a means of public safety access to more spectrum whose broadband channelization would not be subject to protracted rulemaking. It would be a missed opportunity, we believe, if the remainder of the 700 MHz spectrum were to be auctioned for commercial use on the present schedule without further consideration by Congress and the FCC of the Cyren Call proposal or

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<sup>2</sup> Letter to Chairman Stevens and Ranking Minority Member Inouye of the Committee on Commerce, Science and Transportation from NENA President Bill Munn, July 5, 2006.

other plans that would provide increased spectrum and broadband capabilities for public safety.

Respectfully submitted,

NENA

By \_\_\_\_\_  
James R. Hobson  
Miller & Van Eaton, PLLC  
1155 Connecticut Avenue, N.W.  
Suite 1000  
Washington, D.C. 20036-4320  
(202) 785-0600

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ITS ATTORNEY